

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 20-mj-681 (TNL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JOINT MOTION FOR CONTINUANCE  
AND EXCLUSION OF TIME**

SHADOR TOMMIE CORTEZ  
JACKSON,

Defendant.

The United States of America, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Chelsea A. Walcker and John Docherty, Assistant United States Attorneys, and the defendant, Shador Tommie Cortez Jackson, by and through his counsel, Jordan Kushner, hereby jointly move the Court for a 30-day continuance and exclusion of time under the Speedy Trial Act to allow the parties additional time to review and analyze discovery and discuss potential options for case resolution.

The Speedy Trial Act requires that an information or indictment be entered within thirty days of a defendant's arrest. 18 U.S.C. § 3161(b). However, the Act includes a list of certain periods of delay that are excluded in computing the thirty-day period. *See* 18 U.S.C. § 3161(h). Section 3161(h)(7) excludes any period of delay for cause.

Here, Mr. Jackson was arrested on September 10, 2020, pursuant to a Criminal Complaint and Arrest Warrant. (*See* Docket Nos. 1–2.) Under the Speedy Trial Act, an information or indictment presently must be filed by October 10, 2020. *See*

18 U.S.C. § 3161(b). The parties jointly request a continuance of an additional 30 days, until November 9, 2020, and an exclusion of such time from the computation of the Speedy Trial Act, for good cause pursuant to 18 U.S.C. § 3161(h)(7). The parties are working expeditiously to review discovery in this matter and negotiate a potential case resolution. A continuance of 30 days will allow the parties sufficient time to review and analyze discovery and discuss potential resolution of Mr. Jackson's case, and for Mr. Jackson to meet with his counsel and discuss the same. Mr. Jackson has discussed this matter with his undersigned counsel and voluntarily makes this request, with full knowledge of his rights under the Speedy Trial Act.

Respectfully Submitted,

ERICA H. MacDONALD  
United States Attorney

Date: 10/6/2020

/s/ Chelsea A. Walcker  
CHELSEA A. WALCKER  
JOHN DOCHERTY  
Assistant United States Attorneys

Date: 10/6/2020

/s/ Jordan Kushner  
JORDAN KUSHNER  
Counsel for Defendant